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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TAMARES LAS VEGAS PROPERTIES,
LLC; PLAZA HOTEL & CASINO, LLC; and
T-UPR, LLC,

Plaintiffs,

vs.

THE TRAVELERS INDEMNITY
COMPANY,

Defendant.

Case No. 2:16-cv-02933-JAD-NJK

**STIPULATION AND ORDER RE: PAGE
LIMITS AND BRIEFING SCHEDULE
CONCERNING TRAVELERS' POST-
JUDGMENT MOTION FOR
ATTORNEYS' FEES AND COSTS**

ECF No. 263

STIPULATION

Plaintiffs Tamares Las Vegas Properties, LLC; Plaza Hotel & Casino, LLC; and T-UPR, LLC (collectively "Plaintiffs"), through the law firm of Brownstein Hyatt Farber Schreck, LLP, and The Travelers Indemnity Company ("Travelers"), through the law firms Clyde & Co LLP and Robinson & Cole LLP (Plaintiffs together with Travelers, the "Parties") hereby agree and stipulate as follows:

1. Travelers intends to file a Motion for Attorneys' Fees and Costs pursuant to Fed. R. Civ. P. 54(d) ("Travelers' Motion") on November 30, 2022. *See* ECF No. 262.

- 1 2. Travelers has indicated that its Motion will seek attorneys' fees pursuant to two
- 2 statutes (NRS 18.010 and 28 U.S.C. § 1927), the Federal Rules of Civil Procedure,
- 3 as well as the Court's inherent authority.
- 4 3. Each of these legal grounds presents differing standards for seeking an award of
- 5 fees, and Travelers' Motion and Plaintiffs' Opposition will necessarily include a
- 6 significant discussion of the underlying facts and procedural history of this matter,
- 7 including certain pre-suit activity, pretrial discovery practice, motion practice, the
- 8 trial, and information gathered during recent post-trial discovery.
- 9 4. Additionally, and pursuant to Local Rule 54-14, Travelers' Motion and Plaintiffs'
- 10 Opposition will address Travelers' request for attorneys' fees with thirteen
- 11 categories of information, which includes a discussion of the fees and costs that
- 12 Travelers has incurred throughout the lifetime of this matter.
- 13 5. The Parties agree that there is good cause for increasing the page limits of their
- 14 submissions in that the aforementioned subjects cannot be adequately addressed
- 15 within the page limits prescribed by the Local Rules.
- 16 6. In light of the foregoing, the Parties agree and stipulate as follows:
- 17 a. The page limits of LR II 7-3 shall be waived for the purposes of briefing of
- 18 Travelers' Motion and Plaintiffs' Opposition;
- 19 b. Travelers' Motion shall be limited to 45 pages in length, excluding exhibits;
- 20 c. Plaintiffs' Opposition to Travelers Motion shall be limited to 45 pages in
- 21 length, excluding exhibits;
- 22 d. Plaintiffs shall file their Opposition to Travelers' Motion on or before
- 23 January 20, 2023;

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e. Travelers shall file its Reply to Plaintiffs' Opposition, and in support of Travelers' Motion, on or before February 10, 2023. Said Reply shall be limited to 15 pages in length, excluding exhibits.

Dated: November 22, 2022

Dated: November 22, 2022

**BROWNSTEIN HYATT FARBER
SCHRECK, LLP**

CLYDE & CO US LLP

/s/ Patrick J. Reilly

/s/ Lee H. Gorlin

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ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: 11-22-22